

ORIGINAL

AUSA: Ariana Bloom

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE EXTRADITION
OF SAMUEL JOSEPH WATTS, a/k/a
NATHAN ANDREW WATTS

25 MAG 349

**SEALED COMPLAINT FOR
PROVISIONAL ARREST WITH A VIEW
TOWARDS EXTRADITION**

18 U.S.C. § 3184

ARIANA L. BLOOM, the undersigned Assistant United States Attorney, being duly sworn, states on information and belief that the following is true and correct:

1. In this matter, I represent the United States in fulfilling its treaty obligation to the United Kingdom.

2. There is an extradition treaty in force between the United States and the United Kingdom of Great Britain and Northern Ireland (collectively referenced hereafter as the "Treaty").¹

3. The Treaty provides in Article 12 for the provisional arrest and detention of alleged fugitives pending the submission of a formal request for extradition and supporting documents.

4. In accordance with Article 12 of the Treaty, the Government of the United Kingdom has asked the United States for the provisional arrest of Samuel Joseph Watts ("WATTS"), with a view towards his extradition.

¹ Extradition Treaty Between the Government of the United States of America and the Government of the United Kingdom of Great Britain and Northern Ireland, and related Exchanges of Letters, U.S.-U.K., Mar. 31, 2003, S. TREATY DOC NO. 108-23 (2004) (the "2003 Treaty"), *as amended by the Instrument* as contemplated by Article 3(2) of the Agreement on Extradition Between the United States of America and the European Union signed 25 June 2003, as to the application of the Extradition Treaty Between the Government of the United States of America and the Government of the United Kingdom of Great Britain and Northern Ireland signed 31 March 2003, U.S.-U.K., Dec. 16, 2004, S. TREATY DOC. NO. 109-14 (2006) (the "Instrument"), with Annex (the "Annex") reflecting the integrated text of the operative provisions of the 2003 Treaty and the Instrument (collectively, the "Treaty").

5. According to the information provided by the Government of the United Kingdom, WATTS is charged with (2) two counts of conspiracy to supply a class A controlled drug, contrary to Section 1(1) of the Criminal Law Act 1977 and section 4 (3) Misuse of Drugs Act 1971.²

6. This offense was committed within the jurisdiction of the United Kingdom. On September 23, 2021, the South-East Hampshire Magistrates Court sitting in Portsmouth issued a warrant for WATTS's arrest.

7. The United Kingdom seeks WATTS's provisional arrest with view toward his extradition based on the following facts:

a. In early 2020, WATTS conspired with Shariff Shakur ("Shakur") and Justin Koning ("Koning"), as part of an Organized Crime Group ("OCG"), to supply crack cocaine and heroin to drug users in Portsmouth, England. WATTS operated a mobile phone "deal line" known on the streets as the "Defoe" line. WATTS, through his lieutenants, Shakur and Koning, directed and instructed multiple "runners" between the ages of thirteen and seventeen to deliver heroin and crack cocaine on behalf of the OCG. A fourth accomplice, Blaze Faith ("Faith"), assisted WATTS and the OCG by storing and counting money obtained from the illegal drug operation.

b. Between February 3, and April 12, 2020, Portsmouth police arrested eight underaged "runners" as well as Koning and Shakur, while they were engaged in drug deals. From these arrests, police seized more than £7000 (approximately \$8,800) worth of crack cocaine, a substantial amount of heroin, £7,515 (approximately \$9,626) in cash and multiple mobile phones. Based on phone records from devices seized during these arrests and cell site information obtained for the phone numbers associated with the "Defoe" line, police subsequently identified WATTS as the suspected "Defoe" line operator.

c. On April 28, 2020, Portsmouth police arrested WATTS and Faith at Flat 2, 136 Bassett Avenue, Southampton SO16 7EZ. The investigation revealed that WATTS had been renting this property with cash since March 2020. Police seized two mobile phones from both WATTS and Faith incident to their arrests. One of the mobile phones in Faith's possession contained the SIM card for the "Defoe" line, which Faith attempted to conceal from police in the waistband of her pants.

d. An examination of Faith's personal mobile phone revealed approximately 17,000 text messages between Faith and WATTS. These messages demonstrate that

² The United States is seeking a warrant for WATTS' provisional arrest based only on this charge. The United Kingdom has requested WATTS' provisional arrest on additional charges, and the United States' decision to proceed in urgent circumstances on this select charge is without prejudice to proceeding on additional charges when the United Kingdom's formal request for extradition is submitted to the United States, reviewed by the U.S. Department of State, and submitted to the Court.

WATTS paid Faith and directed her to count and hold cash for him. These messages also make clear that Faith understood WATTS to be operating the “Defoe” line to conduct drug sales.

e. An analysis of the seized “Defoe” line and WATTS’s personal device established that he was the line’s operator. Information establishing WATTS control over the “Defoe” line includes the following:

- The “Defoe” line mostly hit the cell site covering the area of WATTS’ home address on Bassett Avenue, and cell towers around Bassett Avenue.
- CCTV footage from outside of WATTS’ home address show him using a mobile phone when the “Defoe” line is in use in the area.
- The “Defoe” line mirrors the travel pattern of WATTS’s personal phone, indicating the two lines were together, including during trips to Southampton, Portsmouth, London, and Bradford.
- On February 19, 2020, WATTS’s personal phone was used to take a video with a screenshot of him carrying a large bundle of cash and captioned “less than a week on my phone.” Investigators identified the distinctive voice of WATTS on the recording. This video demonstrated that the “Defoe” line was very lucrative since WATTS, Shakur, and Koning have no declared income and do not receive public assistance. Thus, authorities believe the large sums of cash shown in the video and recovered incident to arrest come from illegitimate sources.

f. Analyses of the mobile phones seized incident to the various arrests that occurred during this investigation reveal how the criminal scheme operated, with WATTS, operating the “Defoe” line, directing drug sales through his lieutenants, Shakur and Koning, and which are carried out by the underage “runners.” These arrests are described in more detail below:

- On February 2, 2020, at 12:46hrs, Shakur offered work to C.Z., aged fifteen, to deal drugs for him on the street in Portsmouth, for which C.Z. would be paid £70 (approximately \$90). At 17:48hrs, C.Z. asked if Shakur could find someone else to replace him. It seems Shakur is unable to do so, replying “*ain’t got no one else relying on u bro.*” C.Z. subsequently confirms his arrival at the designated location to Shakur at 18:20hrs, having arrived in a taxi.

Based on call records, Shakur directed C.Z., while Koning handled communication with the “Defoe” line. Phone records indicate that Koning and Shakur were also in contact. At 22:57hrs C.Z. let Shakur know he had delivered

the drugs. Around midnight, C.Z. asked Shakur when he was going to get his "P" (a slang term for money).

On 3 February 3, 2020, police observed C.Z. conducting exchanges with drug users in Portsmouth. He was arrested and police seized a mobile phone, crack cocaine, heroin, and £85 (approximately \$109) in cash. Analysis of phone records shows that on February 3, before C.Z.'s arrest, the "Defoe" line contacted Shakur, Shakur contacted Koning, and Koning contacted C.Z.

- On 25 February 25, 2020, at 15:10hrs, police observed S.R., aged thirteen, conducting drug deals with known drug users in Portsmouth. Upon his arrest, police seized two phones, wraps of crack cocaine, and £466.50 (approximately \$599) in cash. An examination of the seized phones showed that S.R. had been in contact with Shakur seven times between 12:31hrs and 14:59hrs on the day of his arrest. Call data on this day also shows several contacts between the "Defoe" line and Shakur and subsequent contact between Shakur and S.R., prior to S.R.'s arrest.

Phone records further demonstrate that on February 12, 2020, at 22:12hrs S.R. sent Shakur a message saying *"Yo bro, I'll work tomo for free to pay u off."* Additional messages from February 14 and 21 show Koning directing S.R.'s actions, sending messages such as *"Stay there for a bit"* and *"Stay there for like 5-10 mins in case other ppl come."*

- On February 26, 2020, police observed a male customer using his mobile phone before meeting D.A. and L.H., both aged fourteen. As the police tried to detain D.A., he fled and discarded a cellophane package into a nearby yard. Police recovered the package, which contained wraps of heroin, and arrested D.A. at 12:15hrs. Fingerprint analysis of the packaging showed Koning's fingerprints on the package.

Police also arrested L.H. carrying £252.30 (approximately \$324) in cash. The male customer had made calls to the "Defoe" line on 26 February 26 at 11:01hrs and 11:13hrs. The "Defoe" line returned his call at 11:13hrs. He called the "Defoe" line again at 12:32hrs. Call data shows Koning contacting L.H. a number of times before his number went off the network. Koning likewise made three missed calls to D.A.'s phone number just before he was arrested. The "Defoe" line also made several unsuccessful attempts to call Koning during the morning, then was in contact with Shakur throughout the day.

- On February 27, 2020, police observed a female customer meeting B.H. who was aged seventeen at the time. B.H. was arrested shortly afterwards, having discarded a package containing drugs and £225 (approximately \$289) in cash. The package

was later found to contain 27 wraps of crack cocaine totalling 2.47grams and 22 wraps of heroin totalling 4.37grams. Koning had sent a drug deal price list to B.H. on the morning of his arrest.

The female customer had made calls to the “Defoe” line on February 27, 2020, at 12:47hrs, 13:04hrs, 13:10hrs and 13:13hrs, just before B.H.’s arrest. The “Defoe” line called Koning and Koning then called B.H.

- On 4 March 2020 police observed Shakur, B.H., L.H., Z.M., aged seventeen, and another individual. As police tried to detain Shakur police saw him attempt to place a package into a mailbox. Forty wraps of crack cocaine were subsequently found behind the mailbox and another 140 wraps of crack cocaine were found nearby. Call data from Shakur’s phone shows contact between the “Defoe” line and Shakur. Analysis also shows WATTS’ personal phone number mirroring the travel of the ‘Defoe’ line on this date.
- On March 7, 2020, police observed Koning close to drug users under an underpass. Police arrested Koning after he fled on foot. Officers seized a phone he had discarded and £150 (approximately \$193) cash. Koning was searched, and 39 wraps of crack cocaine and 33 wraps of heroin were seized from his underwear. A review of call data shows contacts between the “Defoe” line and Shakur, and Shakur and Koning.
- On March 9, 2020, police observed T.S., aged seventeen, engaged in a drug deal with users and arrested him. Police seized a phone, wraps of crack cocaine and heroin, and £330 (approximately \$424) cash from him. An examination of his seized mobile phone indicated that it had previously been used by Koning, and messages were found from the “Defoe” line. The messages accused the user of ignoring calls from the “Defoe” line because user was with a girl and threatened to physically assault the user. In fact, the phone had been in the possession of the police at the time of the calls.
- On March 19, 2020, police observed J.C., aged eighteen, in exchanges with drug users and arrested him. Officers seized a phone, 27 wraps of heroin, 13 wraps of crack cocaine, and £336 (approximately \$431) in cash from J.C. In an interview with police, J.C. stated that he had been forced to deal drugs, fearing he would be hurt if he refused. Call data shows contact from the “Defoe” line to Koning, then Koning to J.C. prior to his arrest.
- On March 20, 2020, police saw E.M., aged fifteen, in exchange with a male customer who was a known drug user. E.M. was arrested and officers seized a phone, 17 wraps of crack cocaine, 25 wraps of heroin and £358 (approximately \$460) cash. Call data shows the male customer was in contact with the “Defoe”

line, then the “Defoe” line was in contact with Shakur, and Shakur was in contact with E.M.

- On March 20, 2020, just hours after E.M.’s arrest, police saw Koning and had grounds to search him. During a strip search police located 31 wraps of crack cocaine, and 29 wraps of heroin concealed in his underwear. Koning was found with £192.10 (approximately \$246) cash. Call data shows that the “Defoe” line in very frequent contact with Koning from early morning up until his arrest. Most of these calls lasted only a few seconds.
- On March 24, 2020, police observed Koning, Shakur and Z.M. together in Portsmouth. Police arrested Koning and seized a phone, wraps of crack cocaine and heroin, and £140.90 (approximately \$181) cash. Call data shows the “Defoe” line in contact with Shakur and Shakur in contact with Koning.
- On April 6, 2020, police witnessed a known drug user meet with Shakur and Z.M. Both were detained after walking away from officers under an underpass. Two bundles were found nearby, containing 30 wraps of crack cocaine and 54 wraps of heroin. A phone and £480 (approximately \$616) cash were seized from Shakur. £60 (approximately \$77) cash was seized from Z.M.
- On April 9, 2020, police observed Koning heading towards an underpass. When police tried to detain him, he ran, discarding a tub later found to contain drugs. He was arrested and police seized his phone, 30 wraps crack cocaine, 37 wraps of heroin, and £440 (approximately \$565) cash. Z.M.’s fingerprints were also found on the drug wrappings.
- On April 12, 2020, police were called to 54B Ranelagh Road, Portsmouth. Shakur and E.L., seventeen years old, were arrested. Police officers seized a mobile phone, 30 wraps of heroin, £230 cash, and items for use in preparing crack cocaine. Call data shows the “Defoe” line was in regular contact with Shakur.

g. Based on phone records obtained during the investigation, the “Defoe” line changed numbers four times between January 23, and April 28, 2020, to avoid detection, as soon as one number drops from the network, the next one starts: 07942544254 (#4254) was active between January 23, 2020 and February 20, 2020; 07726631432 (#1432) was active between February 20, 2020, and March 6, 2020; 07942223094 (#3094) was active between March 6, 2020 and March 18, 2020, and 07726631452 (#1452) was active between March 17, 2020 and April 12, 2020. Evidence shows that the four phone numbers belonged to the same user; the numbers #4254 and #1432 were used within the same two handsets during their usage periods, and each of the phone lines had hundreds of contact numbers in common.

h. During the investigation, analysts used tools to assist in understanding the large amount of data obtained from the various devices seized during the investigation. By mapping this data, police discovered that each of the drug transaction followed a similar pattern. First, a drug user places a call directly to the “Defoe” line. These calls usually lasted a very short period of time—between five and ten seconds. Once several calls are received to the “Defoe” line, WATTS, using the “Defoe” line, contacts either Koning or Shakur. Then, Koning or Shakur made an outgoing call from their phone to a “runner” who ultimately supplied the drugs to the users.

i. Shakur and Koning were each tried and convicted of conspiring with WATTS to supply class A controlled drugs (count 1- cocaine and count 2- heroin), and one count of arranging or facilitating the travel of eight young people between the ages of 13 and 17 with a view to them being exploited between February 2, 2020, and April 28, 2020. Faith was also convicted for participating in the activities of an organized crime group, including the supply of class A drugs.

j. Following his April 28, 2020, arrest, WATTS was released on bail the following day, with the condition that he live and sleep at the Bassett Avenue residence and notify police of any changes to his address.

k. On August 11, 2021, a summons was sent to WATTS’ last known address to attend the Portsmouth Magistrates Court on September 23, 2021. WATTS subsequently failed to appear at that hearing and the South-East Hampshire Magistrates Court sitting in Portsmouth issued an arrest warrant for WATTS the same day.

8. As part of its provisional arrest request, the United Kingdom provided the booking photograph and fingerprints taken from WATTS upon his arrest on April 28, 2020. Authorities have also provided WATTS’ passport information, including his date of birth and a passport photo which appear to match the two still images of WATTS. One is his passport photograph, and the other one is the picture taken upon his arrest on April 28, 2020, at the Eastern Police Investigation Centre.

9. The offense for which extradition is requested is covered by Article 2 of the Treaty.


10. WATTS may be found within this jurisdiction of this Court. The U.S. Marshals Service, with the assistance of U.K. law enforcement, traced the IP address used by WATTS to access his suspected AirBnB to the Hilton Double Tree in Times Square, 350 West 40th St., New York, NY. Marshals have confirmed that WATTS is currently registered under his true name at that hotel.

11. The Government of the United Kingdom has represented that it will submit a formal request for extradition supported by the documents specified in the Treaty, within the time required under the Treaty.

WHEREFORE, the undersigned requests that a warrant for the arrest of the aforementioned person be issued in accordance with 18 U.S.C. § 3184 and the extradition treaty between the United States and the United Kingdom.


Ariana L. Bloom
Assistant U.S. Attorney

Sworn to before me this 31 day of January, 2025 _____.


HONORABLE JENNIFER E. WILLIS
UNITED STATES MAGISTRATE JUDGE